

**MEMO ENDORSED**

U.S. Department of Justice

United States Attorney

Southern District of New York

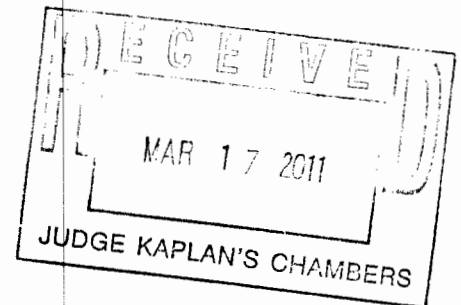
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The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

March 17, 2011

**BY FACSIMILE**

The Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Room 1310  
New York, New York 10007



Re: United States v. Michael Dede,  
07 Cr. 1015 (LAK)  
10 Civ. 7913 (LAK)

Dear Judge Kaplan:

On or about September 30, 2010, the above-named defendant filed a petition pursuant to Title 18, United States Code, Section 2255, asking that the underlying conviction be vacated based upon alleged ineffective assistance of trial and appellate counsel. On October 28, 2010, the Court Ordered the Government to respond within 30 days of October 28, 2010. On December 8, 2010, the Court granted the Government's request for an enlargement of time to file its response. Under that Order, the Government's response was due on January 28, 2011. The Government respectfully requests, *nunc pro tunc*, additional time to respond to the petitioner's motion. The Government inadvertently failed to submit a letter requesting additional time prior to today's date.

The Government's response is nearly complete. The undersigned, however, recently completed a criminal trial before the Honorable Sidney H. Stein, and has been working on several multi-defendant cases that have required much of the undersigned's time. As a result, the Government requests a final, brief extension of time from today's date to submit its response. The Government respectfully requests an additional fourteen days, until March 31, 2011, to submit a response to the


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petitioner's motion. Because the defendant is incarcerated, the Government did not seek his consent prior to submitting this letter.

Respectfully submitted,

PREET BHARARA  
United States Attorney

By:

  
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White Deer, PA 17887  
*pro se*

**MEMO ENDORSED**

*Y. L. L. L.*

*He*

SO ORDERED

*3/17/11*